

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA**

FIRST KUWAITI GENERAL
TRADING & CONTRACTING W.L.L.,

Movant,

v.

KELLOGG BROWN & ROOT
INTERNATIONAL, INC.,

Respondent.

No. 1:23-mc-00001-AJT-WEF

**NOTICE OF KBR'S RESPONSE TO FIRST KUWAITI GENERAL TRADING &
CONTRACTING W.L.L.'S MOTION TO VACATE ARBITRAL AWARD AND KBR'S
MOTION TO CONFIRM ARBITRATION AWARD**

Pursuant to the Federal Arbitration Act, 9 U.S.C. §§ 9, 10, Kellogg Brown & Root International, Inc. ("KBR") files this response ("Response") to First Kuwaiti General Trading & Contracting W.L.L.'s Motion to Vacate Arbitral Award ("Motion") and KBR's Motion to Confirm Arbitration Award ("Motion to Confirm"), and KBR respectfully requests that the Court deny the Motion and grant KBR's Motion to Confirm.

The grounds for KBR's Response and Motion to Confirm are set forth in the accompanying brief, declaration, and exhibits attached thereto. As explained in the brief, FKTC's Motion is untimely, and FKTC has failed to establish any of the grounds under the FAA to support vacating the arbitration award. Because of this, the final award should be confirmed by the Court.

KBR seeks an order denying FKTC's Motion to Vacate the Arbitration Award and confirming the arbitration award, and granting such other and further relief the Court deems just and proper.

Date: February 2, 2023

Respectfully submitted,

By: /s/ Douglas L. Patin

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed by ECF and served by email to the following counsel on this the 2nd day of February 2023:

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